

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

Frank and Teresa Helmka

Debtors.

Case No. 18-32272-CMG

Chapter 11

Honorable Christine M. Gravelle,
U.S.B.J.

Hearing Date and Time: February 8,
2022

**NOTICE OF MOTION PURSUANT TO SECTION 363(b) AND (f) OF THE
BANKRUPTCY CODE AUTHORIZING AND APPROVING THE SALE OF
PROPERTY, FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND
INTERESTS WITH PROCEEDS TO ATTACH TO ALLOWED SECURED CLAIMS**

To: All Parties on Attached Service List

PLEASE TAKE NOTICE that on February 8, 2022 at 10:00am, Frank and Teresa Helmka (the “Debtors”), shall move before the Honorable Christine M. Gravelle at the United States Bankruptcy Court for the District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Courtroom #3, Trenton, New Jersey 08608, for the entry of an order approving the sale of real property identifiable as 2165 Allenwood Road, Wall Township, NJ 07719 free and clear of liens, claims encumbrances and interests and approving payment to allowed secured claims.

PLEASE TAKE FURTHER NOTICE that the Debtors shall rely upon the certification of co-Debtor, Frank Helmka, which is being filed simultaneously herewith, in support of the relief sought. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-2(a), opposition to the relief requested, and, or cross-motions, if any, shall be filed with the Clerk of the Bankruptcy Court and served upon all parties in interest at least seven (7) days before the hearing date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

Law Office of Eugene D. Roth,
Attorney for Debtors

By: /s/ Eugene D. Roth, Esq
Eugene D. Roth, Esq

Dated: January 14, 2022